

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JOHN CIURCINA,

Plaintiff

STIPULATION

-against-

1:19-CV-674 (JMA)

NICK HAROS and ORLAND OIL AND GAS, LLC

Defendants.

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It is hereby stipulated between the undersigned attorneys for the parties herein as follows:

1. Defendants, upon the so ordering of this stipulation, shall execute a waiver of service. Defendants' time to answer or otherwise move shall be on or before 60 days from the execution of the waiver.

2. John Ciurcina, as defendant, in the pending action, ORLAND OIL AND GAS, LLC and NICHOLAS HAROS V. JOHN CIURCINA, 1:19-CV-00014-C (USDC, Northern Dist. Texas), waives any objection to the adequacy of service.

3. Should any extension of the time to answer or otherwise move be granted in the Texas action (whether by agreement or court order), the time for defendants' in this action to answer or otherwise move shall be extended by the same amount of time.

4. This stipulation shall not be deemed a waiver of any objection to venue, forum, jurisdiction or any other issues in this action.

Dated: New York, New York

Pastore & Dailey LLC

By: Joseph M. Pastore III, Esq. (EDNY 1717)  
Attorneys for Plaintiff

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SO ORDERED:

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Hon. Joan M. Azrack